April 26, 2013

U.S. Submission to the Subsidiary Bodies on the work programs for clarification and further understanding of Party mitigation pledges

Overall framing of mitigation clarification

The U.S. is pleased to provide comments on the work programs for the clarification and further understanding of Party mitigation pledges. Durban (2/CP.17 paras 5 and 33-34) established the framework for the clarification and further understanding of mitigation pledges by Parties.

In Doha, Parties agreed to continue these processes under the Subsidiary Bodies, maintaining the same purpose and following the same modalities for clarification and understanding of pledges that were established in Durban and carried out during the past two years. It was agreed that it would be useful in the next two years to continue the clarification and understanding processes until such time when Parties submit biennial reports and the review processes of IAR and ICA commence. The understanding was that there remains some information about pledges by Parties that is not yet clear or well understood, and that the work program in the Subsidiary Bodies would be necessary to allow Parties to continue to provide information about their pledges contained in the INF.docs.

In Doha, Parties also provided additional topics for consideration, within the existing framework, including any common elements in measuring progress for developed countries and additional considerations of support needs and provision through multiple channels, including the registry for developing countries. Parties agreed that providing a more structured discussion, following the topics laid out in Durban and in Doha, would allow for more effective workshops and discussion to enhance understanding. Although the topics have been refined to provide a more specific focus, the process itself must follow the original purpose that was established in Durban, which is to allow Parties to clarify, and provide further understanding of, their pledges, while facilitating that understanding by considering commonalities and differences in an objective manner.

Developed Country Process:
The clarification process for developed countries should include thematic, in-session, discussions, based on the submissions by Parties clarifying their national approaches to reporting progress towards UNFCCC mitigation pledges. These sessions should include participation by Parties, experts, and observer organizations, and could include presentations, technical briefings by the Secretariat on the updated technical paper based on Parties' submissions on their targets, and facilitated discussions. The thematic discussions should be organized around the following elements in 2/CP.17 paragraph 5, with one thematic discussion for each topic:

1. Coverage and metrics (base year, GWP, coverage of gases and sectors)
    - These issues have been addressed quite thoroughly, and each developed country has provided in writing its approach on each of these elements and the differences in approaches are well understood. While some time could be spent soliciting any new information on coverage and metrics, most of the time should be spent on the following two topics.
2. Role of LULUCF
    - This discussion could include the basis for LULUCF accounting (net-net or gross-net); whether a land-based or activity-based accounting approach has been used; whether all significant sources, pools and gasses have been included; how reference levels are calculated; and how natural disturbances are addressed.
3. Emissions units from market-based mechanisms

- This discussion should include information from Parties on the use of market-based mechanisms that result in international transfers of mitigation outcomes, including procedures for issuance and retirement/cancellation of emission units, and sources of emission units from market-based mechanisms resulting in international transfers of mitigation outcomes that Parties wish to count towards their mitigation pledges, as well as ways to avoid double claiming of mitigation effort.

Developing Country Process:

The clarification process for developing countries should include thematic in-session discussions, based on the submissions by Parties clarifying their nationally appropriate mitigation actions. This process should include the participation of Parties, experts, and observer organizations, and entail presentations by Parties and technical experts, as well as facilitated discussions. These thematic discussions should be organized around the following elements in 2/CP.17 paragraphs 33 and 34, with one thematic discussion for each topic:

1. Underlying assumptions and methodologies of mitigation pledges contained in the INF documents, including sectors and gases covered, GWP values, and estimated mitigation outcomes:
    - Due to the large number of developing country Parties, the fact that many new Parties have submitted pledges, and the fact that only a few have submitted the requested clarification information on the pledges, this discussion should comprise the bulk of the time for the in-session discussions.
    - Having the basic information from those who have pledged is the first critical step to understanding the diversity of the actions pledged. This information should then be compiled in a single technical document, based on submissions and presentations by the parties themselves.
    - Three in-session discussions should be convened focusing on the following elements:
        - Coverage of sectors and gases, GWP values;
        - Estimated mitigation outcomes, and the methodologies and assumptions in measuring those outcomes; and
        - Use of, or generation of units from, market-based mechanisms, and measures for tracking units that are transferred across international borders and counted towards Parties' pledges, including approaches to avoid double claiming
2. Support needs for implementation, including financial, technology and capacity-building support for the preparation and implementation of actions, as well as support available and provided, access modalities and related experience gained, including through the registry.

Within this in-session discussion, developing country Parties should be invited to present, for each nationally appropriate mitigation action listed in the INF.doc, the underlying assumptions and methodologies used to determine support needed for implementation, including clarification of what elements of the action will be financed through domestic sources, based on national capabilities, and what complementary role international sources could play.